

EXHIBIT A

The term “documents” is used in its broadest sense, and includes, without limitation, written material of whatever kind or nature, whether typed, printed, handwritten or otherwise produced including, without limitation, letters, memoranda, notes, contracts, bills, invoices, spreadsheets, photographs, calendars, Photostats, photocopies, data, audio, or video recordings, and electronic data compilations, including computerized files, computer disks, hard drives, database records, “voice mail” or “phone mail” recordings, and “electronic mail” or “e-mail” messages, however stored, as well as drafts, revisions, and redline versions or iterations, whether paper or electronic. Spreadsheets and any other documents that contain formulae and/or calculations are to be produced in readable electronic format and in such a way that the formulae and/or calculations may be reviewed.

Further, the “documents” requested herein extend to and include any and all such materials within the possession, custody, or control of your agents, attorneys, or representatives, regardless of where located. You are to produce the materials in your possession, custody, or control listed below:

1. Current curriculum vitae;
2. All documents and materials, published or unpublished, on which you intend to rely as a basis, in whole or in part, for the opinions you intend to express in this litigation;
3. All materials and documents obtained, received, reviewed, considered, or consulted by you in connection with your testimony in this litigation, whether you found the matter contained in those documents or materials to be helpful or not. The documents and materials requested include, but are not limited to, all records, data, depositions, statements, transcripts, medical, articles, books, and correspondence;
4. All documents, including but not limited to, notes, data, spreadsheets, reports, draft reports, interim iterations of reports, records, and computer disks, prepared or otherwise recorded by you, or at your direction, concerning or relating to your testimony in this litigation. The documents requested include, but are not limited to, all such documents relating to your review of documents, and those relating to the formulation of your opinions in this litigation;
5. All articles or papers you have written, presented, or have participated in writing or presenting, that relate to or concern the subject matter of your testimony in this litigation;
6. All documents concerning any research that you have undertaken that relate to or concerns the subject matter of your testimony in this litigation, whether you found the research to be helpful or not;

7. All documents, data, or other materials supplied to you by the plaintiffs or their attorneys in this litigation;

8. All correspondence or other documents reflecting communications with anyone regarding your testimony in this litigation or its subject matter, including, but not limited to, e-mail correspondence;

9. All writings, notes, or other tangible evidence concerning conversations that you have had with anyone concerning or relating to your testimony in this litigation;

10. All photographs which you have reviewed concerning or relating to your testimony in this litigation;

11. Copies of all affidavits, reports, and sworn testimony given by you, whether at deposition or trial or otherwise, that relate to or concern the subject matter of your testimony in this litigation; and

12. All reports, draft reports, iterations of reports, inserts to reports, redlined versions of reports, and/or modifications or supplements to reports prepared by or provided to you.